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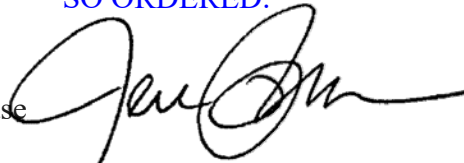
November 1, 2023

Application GRANTED. The Clerk of Court is directed to
terminate ECF No. 68.

VIA ECF

SO ORDERED.

Hon. Jesse M. Furman
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007



November 1, 2023

Re: Reuveni v. Unapologetic Foods, LLC
No. 22 CV 10930 (JMF)

Dear Judge Furman:

We represent the Plaintiff in the above-referenced action. I write to respectfully request an extension of time for Plaintiff to oppose certain Defendants' pending motion for judgment on the pleadings.

The current deadline for Plaintiff's opposition is Monday, November 6, 2023. I respectfully request a two-week extension of this deadline, to November 20, 2023. I seek this extension due to my other work commitments since Defendants filed their motion on October 22, 2023. These include (1) in this action, meeting with several Opt-In Plaintiffs concerning discovery, preparing discovery responses, and reviewing documents for production, a process which is not yet complete; and (2) in another action, preparing for and defending one deposition last week, preparing for and defending five depositions over the next 15 days, and preparing for and taking one deposition in the next two weeks. This is the first request for an extension of this deadline. The parties' next appearance before the Court is on November 28, 2023.

Defendants do not consent to this request. Defendants' stated reason for opposing this request is that they do not believe it should take a month to respond to a motion based on the four corners of the pleading,¹ and any cross-motion to amend should not take more than a few days to prepare. However, not only is opposing Defendants' motion a more complex undertaking than Defendants believe, but due to my other obligations the current deadline of November 6, 2023

¹ Defendants' assertion that consideration of their motion is limited to the four corners of the pleading. As the parties have already engaged in some discovery, the Court can and should consider both the pleadings and the record developed in discovery to date. *See Ideal Steel Supply Corp. v. Anza*, 652 F.3d 310, 325 (2d Cir. 2011).

does not provide sufficient time to properly oppose Defendants' motion. Accordingly, I respectfully request that the Court grant this extension request.

Respectfully submitted,

/s/Denise A. Schulman
Denise A. Schulman

cc: All counsel (via ECF)